

November 4, 2022

VIA ECF

The Honorable Sarah L. Cave
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Catherine McKoy, et al. v. The Trump Corporation, et al., 18-cv-9936 (LGS) (SLC)

Dear Judge Cave:

We write jointly pursuant to the Court's October 11, 2022 order, ECF 486. We are pleased to report that the parties have completed all fact-witness depositions, including the depositions of Donald J. Trump, Eric Trump (as 30(b)(6) designee of The Trump Corporation), and Hope Hicks, with two exceptions addressed in prior filings with the Court.

First, Defendants have given notice of their intent to serve a deposition subpoena on former Plaintiff Millard Williams, *see* ECF 469, and have provided Plaintiffs' counsel with a copy of a deposition subpoena with a deposition date of November 8, 2022.

Second, Plaintiffs have filed a pre-motion letter seeking leave to serve one additional deposition subpoena (for a deposition not to exceed three hours) on a former employee of The Trump Corporation following testimony at the depositions of Defendant Donald J. Trump and Eric Trump (as 30(b)(6) designee), ECF 490. Defendants intend to respond to Plaintiffs' pre-motion letter in accordance with this Court's individual practices.

The parties also have exchanged the initial expert disclosures required by the Court's Seventh Amended Civil Case Management Plan and Scheduling Order, ECF 456 ¶ 3(a), and are continuing apace with expert discovery.

Respectfully submitted,

/s/ John C. Quinn

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